

11/14/19
HMG: USAO#2019R00460

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES

CRIMINAL NO.

v.

(False Claims, 18 U.S.C. § 287)

MELISSA HEYER,

Defendant.

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INDICTMENT

COUNTS ONE TO FIVE – FALSE CLAIMS

The Grand Jury for the District of Maryland charges:

INTRODUCTION

At times material to this Indictment:

1. Defendant MELISSA HEYER (“HEYER”) was a resident of Montgomery County, Maryland.
2. Company A had a contract with Company B, pursuant to which Company A provided employees that performed national security duties for the U.S. Department of Defense (“DOD”). Company A was the subcontractor and Company B was the prime contractor.
3. From in or about January 2017 until in or about March 2019, HEYER worked for Company A, but was assigned on a day-to-day basis to work for the DOD on national security matters at the National Security Agency (“NSA”), Fort Meade, Maryland.

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DISTRICT OF MARYLAND
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4. From in or about January 2017 until in or about March 2019, **HEYER** held a Top Secret-Sensitive Compartmented Information (TS/SCI) security clearance.

5. **HEYER** performed her day-to-day duties for Company A and the DOD at a sensitive compartmented information facility ("SCIF").

6. **HEYER** used a badge reader to gain access to the NSA facility and the SCIF where she performed her daily duties.

7. Companies A and B required **HEYER** to enter her hours online for each day worked.

8. **HEYER** submitted her work hours to Company A and Company B, which then submitted invoices that listed the hours of employees to DOD.

9. From in or about January 2017 until in or about March 2019, **HEYER** was absent from her work location at the NSA, and falsely represented to her employer that she had been working at the NSA SCIF when she was actually elsewhere.

10. From in or about January 2017 until in or about March 2019, **HEYER** caused false claims to be submitted to the DOD that resulted in the government paying more than \$100,000 to Company A, Company B, and **HEYER** to which they and **HEYER** were not entitled.

THE FALSE CLAIMS

11. On or about the dates set forth below, in the District of Maryland and elsewhere, the defendant,

MELISSA HEYER,

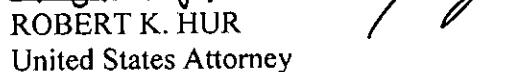
knowingly made and presented and caused to be made and presented to the DOD, a claim against the United States for payment of wages on a government contract, knowing that such claim was

materially false, fictitious, and fraudulent, in that the defendant prepared and caused to be prepared, and filed and caused to be submitted to the DOD, each claim set forth below when the defendant then and there knew that the claims were false, fictitious, and fraudulent because she had not worked the hours claimed:

Count	Date(s) Of Claimed Work	Hours Billed	False Wages Claimed By The Defendant
1	5/11/2017	10	\$856
2	5/17/2017	10	\$856
3	11/1/2017-11/2/2017	16	More than \$1,000
4	2/13/2018	10	\$860
5	7/23/18 – 7/27/18	45.25	More than \$3,500

18 U.S.C. § 287

18 U.S.C. § 2


ROBERT K. HUR

United States Attorney

SIGNATURE REDACTED

Date: